

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PP LLC DBA FF,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE “A”,

Defendants.

Case No. 24-cv-04447

**PLAINTIFF’S AMENDED MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

Plaintiff PP LLC DBA FF (“Plaintiff”) requests leave to file the following attached documents under seal: (1) Plaintiff’s Complaint; (2) Schedule “A” attached to the Complaint, which lists the Defendant Internet Stores; (3) Exhibit 1 to the Complaint, containing Plaintiff’s intellectual property registrations; (4) Plaintiff’s Motion and Memorandum in Support of Plaintiff’s *Ex Parte* Request for an Emergency Temporary Restraining Order, which includes alleged facts of the Complaint and Plaintiff’s reasoning for seeking such an order; (5) Declaration of James E. Judge; (6) Plaintiff’s Declaration; and (7) Exhibits 1 and 2 to the Declaration containing Plaintiff’s intellectual property registration certificates and evidence referenced in the Declaration. In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for design patent infringement, copyright infringement, trademark infringement and counterfeiting, false designation of origin, violation of the Illinois Uniform Deceptive Trade Practices Act, and civil conspiracy.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn

of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the concealment or transfer of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Dated: May 30, 2024

Respectfully submitted,

/s/James E. Judge

Zareefa B. Flener (IL Bar No. 6281397)
James E. Judge (IL Bar No. 6243206)
Ying Chen (IL Bar No. 6346961)
Flener IP Law, LLC
77 West Washington Street, Suite 800
Chicago, Illinois 60602
(312) 724-8874
jjudge@fleneriplaw.com